

Derek W. Loeser (admitted *pro hac vice*)  
KELLER ROHRBACK L.L.P.  
1201 Third Avenue, Suite 3200  
Seattle, WA 98101  
Tel.: (206) 623-1900  
Fax: (206) 623-3384  
dloeser@kellerrohrback.com

Lesley E. Weaver (SBN 191305)  
BLEICHMAR FONTI & AULD LLP  
555 12th Street, Suite 1600  
Oakland, CA 94607  
Tel.: (415) 445-4003  
Fax: (415) 445-4020  
lweaver@bfalaw.com

*Plaintiffs' Co-Lead Counsel*  
*Additional counsel listed on signature page*

Orin Snyder (admitted *pro hac vice*)  
GIBSON, DUNN & CRUTCHER LLP  
200 Park Avenue  
New York, NY 10166-0193  
Tel.: 212.351.4000  
Fax: 212.351.4035  
osnyder@gibsondunn.com

Joshua S. Lipshutz (SBN 242557)  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Avenue, N.W.  
Washington, DC 20036-5306  
Tel.: 202.955.8500  
Fax: 202.467.0539  
jlipshutz@gibsondunn.com

*Attorneys for Defendant Facebook, Inc.*  
*Additional counsel listed on signature page*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC. CONSUMER  
PRIVACY USER PROFILE LITIGATION

This document relates to:

ALL ACTIONS

MDL No. 2843  
Case No. 18-md-02843-VC

**STIPULATION AND [PROPOSED]  
ORDER REGARDING FACEBOOK,  
INC.'S MOTION TO STRIKE PORTIONS  
OF PLAINTIFFS' SECOND AMENDED  
CONSOLIDATED COMPLAINT**

Judge: Hon. Vince Chhabria  
Courtroom: 4, 17th Floor

STIPULATION AND [PROPOSED] ORDER RE  
FACEBOOK, INC.'S MOTION TO STRIKE PORTIONS  
OF PLAINTIFFS' SECOND AMENDED  
CONSOLIDATED COMPLAINT

MDL No. 2843  
CASE NO. 18-MD-02843-VC

The parties stipulate and agree that the Second Amended Consolidated Complaint (“SACC”) shall be limited by the rulings in Pretrial Order No. 20, including without limitation the claims that Pretrial Order No. 20 dismissed with prejudice in full or in part, which shall be stricken from the SACC. By entering into this stipulation, neither Plaintiffs nor Facebook waives any rights (in this Court or on appeal) with respect to Pretrial Order No. 20.

Dated: November 9, 2020

Respectfully submitted,

KELLER ROHRBACK L.L.P.

By: /s/ Derek W. Loeser  
Derek W. Loeser

Derek W. Loeser (admitted *pro hac vice*)  
Cari Campen Laufenberg (admitted *pro hac vice*)  
David Ko (admitted *pro hac vice*)  
Adele A. Daniel (admitted *pro hac vice*)  
Benjamin Gould (SBN 250630)  
1201 Third Avenue, Suite 3200  
Seattle, WA 98101  
Tel.: (206) 623-1900  
Fax: (206) 623-3384  
dloeser@kellerrohrback.com  
clauenberg@kellerrohrback.com  
dko@kellerrohrback.com  
adaniel@kellerrohrback.com  
bgoould@kellerrohrback.com

Christopher Springer (SBN 291180)  
801 Garden Street, Suite 301  
Santa Barbara, CA 93101  
Tel.: (805) 456-1496  
Fax: (805) 456-1497  
cspringer@kellerrohrback.com

Eric Fierro (admitted *pro hac vice*)  
3101 North Central Avenue, Suite 1400  
Phoenix, AZ 85012  
Tel: (602) 248-0088

STIPULATION AND [PROPOSED] ORDER RE  
FACEBOOK, INC.’S MOTION TO STRIKE  
PORTIONS OF PLAINTIFFS’ SECOND AMENDED  
CONSOLIDATED COMPLAINT

BLEICHMAR FONTI & AULD LLP

By: /s/ Lesley E. Weaver  
Lesley E. Weaver

Lesley E. Weaver (SBN 191305)  
Anne K. Davis (SBN 267909)  
Joshua D. Samra (SBN 313050)  
Matthew P. Montgomery (SBN 180196)  
Angelica M. Ornelas (SBN 285929)  
555 12th Street, Suite 1600  
Oakland, CA 94607  
Tel.: (415) 445-4003  
Fax: (415) 445-4020  
lweaver@bfalaw.com  
adavis@bfalaw.com  
jsamra@bfalaw.com  
mmontgomery@bfalaw.com  
aornelas@bfalaw.com

Fax: (602) 248-2822  
efierro@kellerrohrback.com

*Plaintiffs' Co-Lead Counsel*

Dated: November 9, 2020

Respectfully submitted,

**GIBSON, DUNN & CRUTCHER, LLP**

Deborah Stein (SBN 224570)  
dstein@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
333 South Grand Avenue  
Los Angeles, CA 90071-3197  
Telephone: 213.229.7000  
Facsimile: 213.229.7520

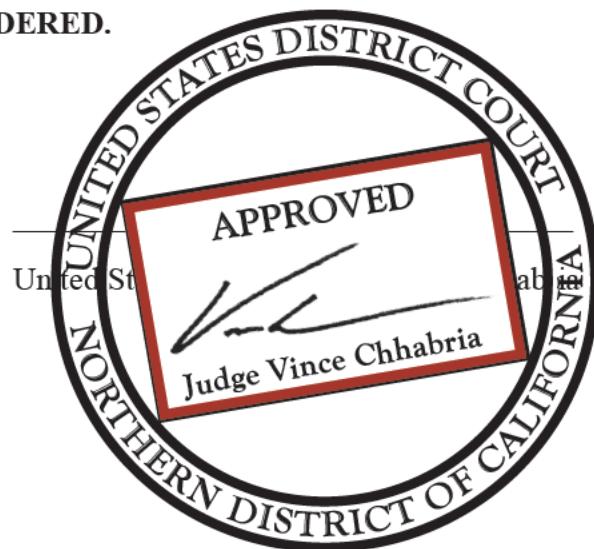
Kristin A. Linsley (SBN 154148)  
klinsley@gibsondunn.com  
Martie Kutscher (SBN 302650)  
mkutscherclark@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
555 Mission Street, Suite 3000  
San Francisco, CA 94105-0921  
Telephone: 415.393.8200  
Facsimile: 415.393.8306

*Attorneys for Defendant Facebook, Inc.*

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATE: November 9, 2020

STIPULATION AND [PROPOSED] ORDER RE  
FACEBOOK, INC.'S MOTION TO STRIKE  
PORTIONS OF PLAINTIFFS' SECOND AMENDED  
CONSOLIDATED COMPLAINT



**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

I, Derek W. Loeser, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 9th day of November, 2020, at Seattle, Washington.

/s/ Derek W. Loeser

Derek W. Loeser

**CERTIFICATE OF SERVICE**

I, Sarah Skaggs, hereby certify that on November 9, 2020, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to all counsel of record.

**In addition, the following were served via email:**

Anjeza Hassan  
annie.sara@yahoo.com

/s/ Sarah Skaggs  
Sarah Skaggs